

STATE OF COLORADO

COLORADO DEPARTMENT OF HEALTH

Dedicated to protecting and improving the health and environment of the people of Colorado

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Ray Rorner
Governor

Patricia A. Nolan, MD, MPH
Executive Director

January 21, 1993

Mr. Richard J. Schassburger
U. S. Department of Energy
Rocky Flats Office, Bldg 116
P.O. Box 928
Golden, Colorado 80402-0928

RE: Technical Memorandum (TM) 7: Surface Soil Sampling and Analysis
Plan, OU 2, January, 1993

Dear Mr. Schassburger,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division), has reviewed the above referenced document submitted by DOE and prime operating contractor, EG&G. The Division hereby conditionally approves TM 7, subject to the following concerns:

1) The Division does not understand footnote C on Tables 3-2A and 3-2B. While the text explains that Chromium VI will be included in the analytical suite of only 30% of the samples, no restrictions are placed on the remaining metals. In fact, the remainder of these tables suggest that all 49 surface soil samples will be analyzed for metals. The Division will not approve the analytical portion of this plan unless all samples are tested for all metals. We do agree, however, with the limited Chromium VI analysis.

2) The Division believes that Appendix A is a prudent method for determining the analytical sensitivity required to support the Baseline Risk Assessment. However, we do not agree with several of the values proposed for use in the intake estimate equations. On Table A-1, values for HQ, FI, and ME are incorrect. All of these variables should be given a value of 1.0. The same is true for these variables as presented on Tables A-2 and A-3. The values for these variables received extensive discussion on OU 1 and DOE agreed to either remove them from the equation or assign a value of 1.0. This makes the calculated exposure limits presented on Table A-5 incorrect and may necessitate lower detection limits on certain analytes.

If you have any questions regarding these matters, please call Joe Schieffelin of my staff at 692-3356.

Sincerely,

A handwritten signature in cursive script, reading "Gary W. Baughman". The signature is written in dark ink and is positioned above the typed name and title.

Gary W. Baughman, Chief
Facilities Section
Hazardous Waste Control Program

cc: Martin Hestmark, EPA
Scott Grace, DOE
Mike Arndt, EG&G
Eric Dille, EG&G
Jackie Berardini, CDH-OE